

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re: ) IN CHAPTER 7 PROCEEDINGS  
DARIUS MILES, )  
Debtor(s). ) BK 16-30876  
)  
)

**TRUSTEE'S APPLICATION TO APPROVE  
AGREEMENT TO PURCHASE VEHICLE**

TO: HON. LAURA K. GRANDY, U. S. Bankruptcy Judge

The application of Donald M. Samson, trustee, respectfully alleges:

1. Donald M. Samson is the duly appointed and acting trustee in the above matter.
2. That among the assets in the bankruptcy is a 2011 Camaro.
3. The 2011 Camaro is currently in the possession of Overkill Custom, Inc., Sparta, Illinois and has been there for repairs since 2014. There is front end damage to the vehicle and substantial engine and body work is needed. The current charge for work on the vehicle by Overkill is \$1,395.00 which does not include storage charges. Overkill's usual rate for storage is \$25.00 per day.
4. That Donald M. Samson, trustee, and Overkill Custom, Inc. have entered into an Agreement to Purchase Vehicle, a copy of which is attached hereto. The Agreement provides for Donald M. Samson, trustee, to sell the 2011 Camaro to Overkill Custom, Inc. for \$5,000.00 with Overkill Custom, Inc. waiving all charges for work performed on the vehicle and all potential storage and other charges. The Agreement provides further that Donald M. Samson, trustee, will provide Overkill Custom, Inc. a bill of sale and vehicle title.
5. The Agreement is subject to approval by the U.S. Bankruptcy Court.

WHEREFORE, your Trustee prays that this application be granted as set forth herein, and for such further relief as this Court deems just and equitable.

DATE: June 13, 2017

/s/ Donald M. Samson  
DONALD M. SAMSON, Trustee  
226 W. Main St., Ste., 102  
Belleville, IL 62220  
618-235-2226

CERTIFICATE OF SERVICE

The undersigned certifies that on the 13<sup>th</sup> day of June, 2017, a copy of the foregoing document, Application to Approve Agreement to Purchase Vehicle, was served upon the following either electronically or by first class mail, postage prepaid:

SEE ATTACHED MATRIX

Robert E. Eggmann, Attorney  
Carmody MacDonald PC  
120 S. Central Ave., Ste 1800  
St. Louis, MO 63105

U.S. Trustee  
Becker Bldg. Rm. 1100  
401 Main St.  
Peoria, IL 61602

/s/ Donald M. Samson

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FOR THE SOUTHERN DISTRICT OF ILLINOIS**

In Re:	)	IN CHAPTER 7 PROCEEDINGS
	)	
DARIUS MILES,	)	BK 16-30876
	)	
Debtor(s).	)	

**AGREEMENT TO PURCHASE OF VEHICLE**

COMES NOW Donald M. Samson, trustee, and Overkill Custom, Inc., and enter into this Agreement as follows:

1. Donald M. Samson is the duly appointed and acting trustee in the above matter.
2. That among the assets in the bankruptcy is a 2011 Camaro.
3. The 2011 Camaro is currently in the possession of Overkill Custom, Inc., Sparta, Illinois and has been there for repairs since 2014. There is front end damage to the vehicle and substantial engine and body work is needed. The current charge for work on the vehicle by Overkill is \$1,395.00 which does not include storage charges. Overkill's usual rates for storage is \$25.00 per day.
4. Donald M. Samson, trustee, agrees to sell to Overkill Custom, Inc. said 2011 Camaro for \$5,000.00 and Overkill Custom, Inc. agrees to waive all charges for work performed on the vehicle and for all potential storage and other charges.
5. Donald M. Samson, trustee, will provide a bill of sale and title to Overkill Custom, Inc.
6. This Agreement is subject to approval by the U.S. Bankruptcy Court.

AGREED TO

Overkill Custom, Inc.

by /s/ Shawn Martin  
Shawn Martin

Donald M. Samson, Trustee

/s/ Donald M. Samson

Label Matrix for local noticing  
0754-3  
Case 16-30876-lkg  
Southern District of Illinois  
East St Louis  
Tue Jun 13 14:58:18 CDT 2017

Ameren Illinois  
2105 E State Route 104  
Pawnee, IL 62558-4685

BV Capital LLC  
Steven M Hamburg  
120 S Central Ave  
St Louis, MO 63105-1705

Donneisha Jackson  
2819 Grand Slam Dr  
O'Fallon, MO 63366-4660

Robert E Eggmann  
Carmody MacDonald PC  
120 S Central Ave  
Suite 1800  
St Louis, MO 63105-1726

Steven M Hamburg  
Muhm and Reilly  
120 S Central Ave  
Suite 1600  
St Louis, MO 63105-1798

(p) INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Kerri Laing  
30 North LaSalle St  
Suite 3400  
Chicago, IL 60602-3337

Kramon & Graham, P.A.  
Attn Catherine M Manofsky  
One South Street  
Suite 2600  
Baltimore, MD 21202-3291

Darius Miles  
1906 Llewellyn  
Belleville, IL 62223-7904

Donald M Samson  
Attorney  
226 W Main St  
Suite 102  
Belleville, IL 62220-1504

Tasheka Franklin  
14126 Harvest Meadows Lane  
Rosharon, TX 77583-2093

United States Trustee  
Becker Bldg, Room 1100  
401 Main St  
Peoria, IL 61602-1267

arthurjameela moore  
847 e. 52nd st . unit 3  
chicago, IL 60615-3881

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service  
P.O. Box 66778  
STOP5334STL  
Saint Louis, MO 63166

End of Label Matrix  
Mailable recipients 13  
Bypassed recipients 0  
Total 13